

REMARKS

The Examiner's action and the references relied upon therein have been carefully considered and the application has been amended accordingly. Specifically, claim 1 has been amended and rewritten as claim 5 to recite that the tool consists of two mold parts constituting two groups of parallel mold cavities, each group of mold cavities comprises at least two subgroups of mold cavities, each mold cavity within each subgroup is laterally spaced apart from an adjoining mold cavity and the mold cavities of the first subgroup of each of the groups are spaced apart from the mold cavities in the second subgroup of each group by a distance in a direction perpendicular to the lateral direction. In addition, new claim 5 expands the recitation of axis (A) and defines an intersecting point of said axis with the plane of rotation for defining a center of rotation. Finally, new claim 5 clarifies which is meant by the formerly used term "exclusively point symmetric." Arrangement of the mold cavities in the fashion set forth in claim 5 makes it possible to arrange multiple mold cavities in a space-savings manner and close to the center, which has many advantages as are set forth at page 2 of the specification

Please refer to the following detailed explanation, with reference to Figure 1 of the instant application (marked in red and blue to distinguish the first and second groups and to identify the subgroups), of the limitations of claim 5:

- a) The tool according to the invention consists of exactly two mold parts (albeit only mold part 10 is shown in the drawings) constituting exactly two groups of mold cavities, a first group 12 and a second group 14 (thus obviating the Examiner's comments beginning at page 8, line 6 of the last paragraph);
- b) Each group of mold cavities has an associated recess 26 (see Figure 2) formed in one of the mold parts with mold inserts 24 inserted into the recesses 26;
- c) Partial cavities 22 are formed in the mold inserts 24 which correspond to a head portion of the tooth brush bodies;
- d) A center of rotation is defined by the point defined by the intersection of axis A and the plane of rotation of the carrier arm 30 (i.e., the plane of the drawing);
- e) The mold inserts 24 are attached to the carrier arm 30;

- f) The mold cavities of the first group 12, 14 are arranged on one side of the carrier arm while the mold cavities of the second group 16, 18 are arranged on the opposite side;
- g) The mold cavities in the first group 12, 14 are arranged parallel to each other and have an identical orientation and the same applies to the mold cavities of the second group 16, 18;
- h) The mold cavities of the first group 12, 14 have an orientation opposite to the orientation of the mold cavities of the second group 16, 18;
- i) The first group of mold cavities 12, 14 is defined by all mold cavities into which a first plastics component is injected;
- j) The second group of mold cavities 16, 18 is defined by all mold cavities into which a second plastics component is injected;
- k) The first group of mold cavities comprises at least two subgroups of mold cavities, i.e., subgroups 12 and 14, and the second group comprises first and second subgroups 16 and 18, respectively;
- l) In each subgroup, the mold cavities are spaced apart from adjoining mold cavities by a distance in a lateral direction;
- m) The mold cavities of the first subgroup 12 of the first group (16 of the second group) are spaced apart from the mold cavities of the second subgroup 14 of the first group (18 of the second group) by a distance in a direction perpendicular to the lateral direction;
- n) The mold cavities of the second group 16, 18 are an exclusive image of the mold cavities of the first group 12, 14 according to a single point reflection with respect to the center of rotation (as used herein "exclusive" means that the mold cavities of the second group 16, 18 cannot be obtained by a single mirror reflection with respect to a line in the plane of rotation running through the center of rotation).

Claims 1-3 stand rejected under 35 USC 102(b) as being anticipated by Boucherie ('176) or Boucherie ('923). These references are substantially identical and have been discussed in the response to the prior office action. Therefore, an extended discussion of these references is omitted. Applicant has included with this response Sheets 2 and 10 of 11 of U.S. 6,051,176 and has marked the first and second groups of mold cavities in blue and red, respectively, so that

there can be no misunderstanding of applicant's interpretation of this reference. In Figure 13, applicant has also marked the first and second subgroups, respectively, of each of the first and second groups. In all embodiments (Figures 2, 12 and 13), the mold cavities of the second group (marked with red ink) are symmetric to the mold cavities of the first group (marked with blue ink) according to a single mirror reflection with respect to line 49 running through the center of rotation 33. Thus, each of the embodiments is mirror symmetric and fails to disclose or suggest limitation n) of new claim 5

Claims 1-3 also stand rejected under 35 USC 102(b) as anticipated by Boucherie ('890) or Boucherie ('368). These references are substantially identical and have been discussed in the response to the prior office action. Therefore, an extended discussion of these references is omitted. Applicant has included with this response Sheet 5 of 5 of U.S. 5,609,890 and has marked on Figure 6 the first and second groups of mold cavities in blue and red, respectively, as well as the first and second subgroups, respectively, of each of the first and second groups so that there can be no misunderstanding of applicant's interpretation of this reference. It can be seen that the mold cavities of the first subgroup of each group do not have an identical orientation to the mold cavities of the second subgroup of each group. Thus, the embodiment of Figure 6 fails to teach or disclose limitation g) of new claim 5. In addition, it will be seen from Figure 6 that there are two carrier arms 16d and 16c, one (16d) for the transport of the mold cavities from the upper right quadrant to the upper left quadrant and one (16c) for the transport of the mold

cavities from the lower right quadrant to the lower left quadrant. The mold cavities of the second group (upper and lower left quadrants) are neither point symmetric with respect to the center of rotation of the upper carrier arm 16d nor point symmetric with respect to the center of rotation of the lower carrier arm 16c. Thus the embodiment of Figure 6 also fails to teach or disclose limitation n) of new claim 5.

According to the Examiner's interpretation of this reference as set forth on page 8 of the office action, last paragraph, only the upper half of Figure 6 need be considered with the mold cavities of the upper left quadrant representing a first group and the mold cavities of the upper right quadrant representing a second group. However, proceeding in this fashion ignores limitations k) and m) of new claim 5. In the arrangement postulated by the Examiner, there are not at least two subgroups for each group of mold cavities. Even were one to assume that the four cavities within each group, as postulated by the Examiner, were divisible into two subgroups, then the embodiment would not disclose or suggest limitation m) which requires that the subgroups be spaced apart by a distance in a direction perpendicular to the lateral direction.

For the foregoing reasons, whether considering the rejection over the '176 and '923 references or the '890 and '368 references, at least one essential limitation of new claim 5 is not met by the cited references. Accordingly, the rejection of the claims under 35 USC 102(b) as fully anticipated by either the '176 and '923 references or the '890 and '368 references is inappropriate and should be reconsidered and withdrawn.

It is, therefore, respectfully submitted that new claim 5 is in condition for allowance. Accordingly, an early Notice of Allowance directed to claim 5 is courteously solicited.

Respectfully submitted,


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